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August 10, 1998

Ms. Magalie Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street N.W.
Room 222
Washington, DC 20554

RE: GEN Docket 98-68

Dear Ms. Salas:

Enclosed please find an original and nine (9) copies of Redcom Laboratories' reply comments for filing in the above referenced proceeding. Also, enclosed is a copy to be stamped and returned for our files.

Sincerely,

Jerome S. Caplan

Jerome S. Caplan
Director of Compliance and System Certification

JSC/jlw

Enclosures

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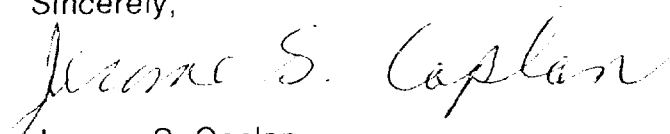
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Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

| | | |
|---|---|----------------------|
| In the matter of: |) | |
| |) | |
| 1998 Biennial Regulatory Review - |) | |
| Amendment of Parts 2, 25 and 68 of the |) | |
| Commission's Rules to Further |) | |
| Streamline the Equipment Authorization |) | |
| for Radio Frequency Equipment, Modify |) | |
| the Equipment Authorization Process for |) | GEN Docket No. 98-68 |
| Telephone Terminal Equipment, |) | |
| Implement Mutual Recognition |) | |
| Agreements and Begin Implementation |) | |
| of the Global Mobil Personal |) | |
| Communications by Satellite (GMPCS) |) | |
| Arrangements |) | |

To: The Commission

**REPLY COMMENTS OF
REDCOM LABORATORIES INCORPORATED**

Redcom Laboratories Incorporated ("Redcom") respectfully submits these reply comments on the above captioned proceeding.¹ Redcom manufactures equipment which would be impacted by these proposed rules. At less than 200 employees, we would be considered a small business under criteria established by the Small Business Administration.

Current rules allow manufacturer test labs to submit test results for equipment under part 68 (and other Parts) without formal ISO/IEC Guide 25 accreditation. The NPRM is not clear on whether such labs will be authorized to

¹ 98 Biennial Regulatory Review - Amendment of Parts 2, 25 and 68 of the Commission's Rules to Further Streamline the Equipment Authorization for Radio Frequency Equipment, Modify the Equipment Authorization Process for Telephone Terminal Equipment, Implement Mutual Recognition Agreements and Begin Implementation of the Global Mobil Personal Communications by Satellite (GMPCS) Arrangements, GEN Docket No. 98-68, (rel. May 18, 1998) (hereafter "NPRM").

continue testing this equipment under a "grandfather Clause". The Telecommunications Industry Association ("TIA") has recommended in their NPRM comments that "The grandfathering period should begin with the adoption of the order and not exceed 24 months."² While Redcom is a TIA member and generally agrees with most of their comments, we do not agree with this one. We propose that manufacturer test labs currently authorized to perform testing and submit test results to the Commission be permanently grandfathered.

As a very small manufacturer, it is imperative for Redcom to minimize our costs in order to stay competitive. In addition, introduction of products to the market in a timely fashion is also very important. Several years ago, Redcom chose to invest in the test equipment needed to do Part 68 testing. We also invested the resources to create an appropriate Part 68 test procedure which has been filed with and accepted by the Commission. This has saved a substantial amount of money over the last several years in testing costs that Redcom would have incurred at outside test facilities, and has allowed Redcom to test when our schedules dictate.

It is of the utmost concern to Redcom that the Commission may be proposing to change the rules in a way that could dramatically increase test costs and test time. If the status of currently approved manufacturer test labs is not permanently grandfathered, the NPRM would only allow for two options. Manufacturers could not become a Telecommunication Certification Body ("TCB") because as a manufacturer they would not be deemed "impartial".³ Manufacturers would either be required to submit equipment to a TCB, or it may

² Comments by Telecommunications Industry Association dated July 27, 1998, section II, page 3.

³ NPRM ¶ 12.

be possible for a manufacturer to become a "subcontractor"⁴ to a TCB. Both of these options would increase Redcom's Part 68 registration burden. This would be exactly opposite to one of the Commissions stated goals for this NPRM.⁵

Summary

Redcom applauds the Commission's goals of finding ways to streamline registration and certification in order for products to be brought to market more quickly, as well as implement Mutual Recognition Agreements with the European Community. However these goals should not be accomplished at the expense of the competitiveness of small manufacturers. Grandfathering the status of current manufacturers' test labs permanently instead of for 24 months would still allow the goals of the NPRM to be met as well as allow small manufacturers such as Redcom the ability to remain competitive.

Respectfully submitted,



Jerome S. Caplan
Director of Compliance
and System Certification

August 6, 1998

Redcom Laboratories, Inc.
One Redcom Center
Victor, NY 14564
(716)-924-7550

⁴ NPRM, Appendix A, Proposed Rule Changes, 8(c) Sub-contracting.

⁵ NPRM ¶ 6 states in part "While we have consistently endeavored to minimize the burden of our equipment certification and registration programs on manufacturers, we believe there are steps we can take to further reduce the burden." (emphasis added).